



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SLT:SD/UAD/LXN
F.#2011R00935

271 Cadman Plaza East
Brooklyn, New York 11201

March 22, 2012

BY ECF

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Re: United States v. James Rosemond, et. al.
Criminal Docket No. 11-CR-424 (S-3)(JG)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, enclosed please find the following supplemental discovery.

At the trial of the above-referenced case, the government expects Detective Sergeant Frank DiGregorio to testify as an expert in the means and methods used by drug traffickers to launder drug proceeds. Specifically, he will testify that drug proceeds are hidden through numerous means, including, but not limited to, trade-based money laundering, such as the use of cash to pay for goods and services in a manner designed to avoid use of the banking system. In addition, he will explain the investment of drug proceeds back into the narcotics business as a means to conceal the source of the money. He will also testify to the use of structuring as a means to avoid transaction

reporting and identification requirements. Attached as Exhibit A is a list of Detective DiGregorio's qualifications.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____/s_____
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Enclosures

CC: Clerk of Court (JG) (w/o enclosures)